

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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In re: LTL MANAGEMENT, LLC, <sup>1</sup>  Debtor.	Chapter 11  Case No.: 23-12825 (MBK)  Honorable Michael B. Kaplan

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**RESERVATION OF RIGHTS OF THE OFFICIAL COMMITTEE OF  
TALC CLAIMANTS TO THE DEBTOR'S MOTION FOR ENTRY OF AN ORDER  
WAIVING THE REQUIREMENT OF RULE 3003-1(a)(1) OF THE LOCAL RULES OF  
THE UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY**

The Official Committee of Talc Claimants (the "Committee"), duly appointed by the Office of the United States Trustee, hereby submits the following reservation of rights to the *Debtor's Motion for Entry of an Order Waiving the Requirement of Rule 3003-1(a)(1) of the Local Rules of the United States Bankruptcy Court District of New Jersey* [Dkt. No. 734] (the "Motion") and respectfully states as follows:<sup>2</sup>

1. The Committee does not object to the waiver of the requirement of Local Bankruptcy Rule 3003-1(a)(1) that proofs of claim by creditors (other than governmental units) and equity security holders be filed seventy (70) days after the Petition Date. This limited relief appears appropriate.

2. The proposed order included with the Motion preserves the Debtor's right to seek an order from the Court fixing the time for the filing of proofs of claim. The Committee reserves all rights, arguments and objections, including the right of the Committee itself to seek an order from the Court fixing the time for filing of proofs of claim and the right of the Committee to contest any motion filed by the Debtor seeking an order from the Court fixing the time for filing of proofs of claim.

Dated: June 12, 2023

Respectfully submitted,  
**GENOVA BURNS, LLC**

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*Proposed Local Counsel to the  
Official Committee of Talc Claimants*

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed thereto in the Motion.